

## **REMARKS**

Reconsideration of the outstanding Office Action is respectfully requested in view of the above amendments and the following comments.

### **Claim Rejections – 35 USC § 103**

In paragraph 1 of the Office Action, claims 11-30 are rejected under 35 USC § 103 as being unpatentable over Mitcham et al. ("Mitcham") in view of Ostwald.

The Office Action states that Mitcham "fails to disclose a clearance air gap being provided to electrically insulate the laminations from the bolt," while "Ostwald teaches the use of an insulating sleeve (24) and an air gap." The Office Action then states that it would have been obvious "to use the insulating sleeve and air gap concept disclosed by Ostwald on the rotor disc assembly disclosed by Mitcham et al."

The sleeve 24 of Ostwald is disclosed as being "an insulating tape of appropriate material such as Mylar which is wrapped on the shank of the bolts." (Col. 2, lines 37-39.) Ostwald provides washers 22 and 23 that receive the bolts "so that there is no danger of the insulation being scraped off from the bolt due to contact with the edges of the lamination." (Col. 2, lines 1-4.) (Also see, Col. 2, lines 40-46.) Thus, by using both the insulating tape and the washers, Ostwald "assures the existence of two continuous insulative barriers between the bolt and the field, namely, the tape and the air gap." (Col. 3, lines 5-8.)

As set forth above, claim 11 requires "at least one uninsulated bolt having an uninsulated outer surface and which extends through the rotor disc, a clearance air gap extending the entire distance between the outer surface of the bolt and the laminations and being provided to electrically insulate the laminations from the bolt passing therethrough." Also, as set forth above, claim 21 requires "an uninsulated fastener having an uninsulated outer surface and extending through the rotor disc, the lamination, the first insulation member, and the second insulating member to attach the pole piece assembly to the rotor disc, and a clearance air gap extending the entire distance between the outer surface of the fastener and the lamination and

provided between the lamination and the fastener to electrically insulate the lamination from the bolt.”

Thus, even if assumed that the proposed combination of Mitcham and Ostwald was proper, the resulting apparatus would not satisfy the claims. That is, the apparatus resulting from the proposed combination would result in a bolt that is insulated, since it is wrapped by an insulating material, and an air gap that merely extends between the wrapped insulating material on the bolt and the core 9 of stacked laminations. In other words, the proposed combination would not provide a bolt (claim 11) or a fastener (claim 21) that was uninsulated, and an air gap extending the entire distance between the outer surface of the bolt (claim 11) or fastener (claim 21) and the lamination, as claimed.

Accordingly, withdrawal of the rejection is respectfully requested.

Claims 12-17, 22-25, and 28-30 depend from and further limit either claim 11 or 21 and are allowable at least for the reasons set forth above with respect to their, *respective independent claim*.

Additionally, paragraph 5 of the Office Action states that the proposed combination discloses “a nut attached to the bolt” and that “the nut secures a spring washer to the bolt.” This is inaccurate as neither Mitcham nor Ostwald disclose or suggest attaching the bolt with a nut and a spring washer. Mitcham does not disclose or suggest any fastening mechanism related to the bolt and Ostwald states that the bolts “are mounted in threaded bores in the shoulder 13” (Col. 2, lines 18-21). Thus, as claim 30 requires both a nut attached to the bolt and a spring washer, claim 30 is further allowable over the prior art of record.

Claims 18 and 26 have been rewritten into independent form and have not been amended or narrowed from their previous state. Claims 19 and 20 remain dependent upon claim 18 and claim 27 remains dependent upon claim 26.

Claim 18 requires “means provided on the bolt for compressing the laminated pole pieces.” This limitation invokes 35 USC §112, 6<sup>th</sup> paragraph. Thus, the claim covers the corresponding structure described in the specification and equivalents thereof. As disclosed in the subject specification, “[a] compressive force is applied to the laminated pole piece 18 via two annular members 24 and 26.” (Substitute Specification, page 4, lines 5-6). However, neither Mitcham nor Ostwald disclose or

suggest two such annular members. Ostwald, instead, compresses its core 9 of stacked laminations by a shoulder washer 22 and the bottom of sleeve 18.

Additionally, claim 19 states that “the means for compressing the laminated pole pieces are resilient to maintain the correct compressive force on the laminated pole pieces throughout operation.” As disclosed in the subject Specification, “[t]he sprung washers 30 are resilient so that the correct compressive force is maintained on the pole pieces 18 regardless of relaxation in the stack of laminations and differential expansion of the rotor component.” (Substitute Specification, page 4, lines 8-10.) However, neither Mitcham nor Ostwald disclose or suggest such resilient members to correct compressive force. Ostwald, instead, merely uses a regular washer with a nut.

Further, claim 20 states that “the means for compressing the laminated pole pieces comprise nuts and spring washers.” As disclosed in the subject Specification, “[t]he outer annular member 26 is tightened down using nuts 28 and a number of spring washers 30.” (Substitute Specification, page 4, lines 6-7.) However, neither Mitcham nor Ostwald disclose or suggest nuts and spring washers as disclosed in the subject application. Instead, Ostwald states that the bolts “are mounted in threaded bores in the shoulder 13” (Col. 2, lines 18-21).

Thus, withdrawal of the rejections to claims 18-20 is respectfully requested.

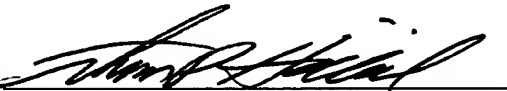
If the Office Action is attempting to contend that the structure of either Mitcham or Ostwald is an equivalent structure under 35 USC 112, 6<sup>th</sup> paragraph for purposes of rejecting claims 18-20, then Applicants respectfully request that “an explanation and rationale” be provided “in the Office action as to why the prior art element is an equivalent” as required by MPEP 2183 and using the appropriate factors as set forth in MPEP 2183.

Claim 26 requires “a nut attached to the bolt” and claim 27 requires a “spring washer.” As set forth above, these limitation are not disclosed or suggested in proposed combination. Accordingly, withdraw of the rejection to claims 26 and 27 is respectfully requested.

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In view of the foregoing, the claims are believed to be in form for allowance, and such action is hereby solicited. If any points remain in issue that the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,  
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